

MICHAEL W. BIEN – 096891  
 ERNEST GALVAN – 196065  
 KARA J. JANSSEN – 274762  
 ADRIENNE SPIEGEL – 330482  
 LUMA KHABBAZ – 351492  
 ROSEN BIEN  
 GALVAN & GRUNFELD LLP  
 101 Mission Street, Sixth Floor  
 San Francisco, California 94105-1738  
 Telephone: (415) 433-6830  
 Email: mbien@rbgg.com  
 egalvan@rbgg.com  
 kjanssen@rbgg.com  
 aspiegel@rbgg.com  
 lkhabbaz@rbgg.com

SUSAN M. BEATY – 324048  
 CALIFORNIA COLLABORATIVE FOR  
 IMMIGRANT JUSTICE  
 1999 Harrison Street, Suite 1800  
 Oakland, California 94612-4700  
 Telephone: (510) 679-3674  
 Email: susan@ccijjustice.org

OREN NIMNI\*  
 Mass. Bar No. 691821  
 AMARIS MONTES\*  
 Md. Bar No. 2112150205  
 RIGHTS BEHIND BARS  
 416 Florida Avenue N.W. #26152  
 Washington, D.C. 20001-0506  
 Telephone: (202) 455-4399  
 Email: oren@rightsbehindbars.org  
 amaris@rightsbehindbars.org

STEPHEN S. CHA-KIM\*  
 N.Y. Bar No. 4979357  
 ARNOLD & PORTER KAYE SCHOLER LLP  
 250 West 55th Street  
 New York, New York 10019-9710  
 Telephone: (212) 836-8000  
 Email: stephen.cha-kim@arnoldporter.com

CARSON D. ANDERSON – 317308  
 ARNOLD & PORTER KAYE SCHOLER LLP  
 3000 El Camino Real  
 Five Palo Alto Square, Suite 500  
 Palo Alto, California 94306-3807  
 Telephone: (650) 319-4500  
 Email: carson.anderson@arnoldporter.com

\* Admitted *pro hac vice*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN  
 PRISONERS et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL  
 BUREAU OF PRISONS et al.,

Defendants.

Case No. 4:23-cv-04155-YGR

**PLAINTIFFS' ADMINISTRATIVE  
 MOTION TO SEAL RELATED  
 DOCUMENTS TO SPECIAL MASTER  
 CANDIDATES**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: None Set

Pursuant to Civil Local Rules 79-5 and 7-10 of the Northern District of California, Plaintiffs file this motion requesting to file related documents to the special master candidates under seal. The Ninth Circuit requires a good cause standard to seal documents related to non-dispositive motions. *Kamakana v. City and Cnty of Honolulu*, 447 F.3d 1172, 1185-86.

Good cause exists for this request. In attempting to provide the Court with sufficient information to proceed with choosing a special master in accordance with 18 U.S.C. § 3626(f)(2) and this Court's order at ECF 223, Plaintiffs are submitting curriculum vitae for each candidate that include personal identifying information which Plaintiffs have redacted from the publicly filed versions as well as a report submitted confidentially in another matter as part of one of the expert's supporting materials.

Sealing these related documents is the narrowest way to protect such information while the Court proceeds with the selection of the special master. Plaintiffs therefore request that the Court grant their request to place the following documents under seal:

Document or Portion to be Sealed	Evidence in Support of Sealing	Ruling
Exhibit A – Armstrong CV	Contains personally identifiable information relating to a non-party including address and phone number.	
Exhibit C – Brown CV	Contains personally identifiable information relating to a non-party including address and phone number.	
Exhibit F – Beltz CV Armstrong CV	Contains personally identifiable information relating to a non-party including address and phone number.	
Exhibit H – Still CV	Contains personally identifiable information relating to a non-party including address and phone number.	

Document or Portion to be Sealed	Evidence in Support of Sealing	Ruling
Exhibit I – Still Materials	Report submitted confidentially in another matter.	

WHEREFORE, Plaintiffs respectfully request that the Court grant this Administrative Motion and enter the attached proposed order sealing Plaintiffs' documents. Federal Defendants do not oppose this request.

DATED: March 25, 2024

Respectfully submitted,

ROSEN BIEN GALVAN & GRUNFELD LLP

By: /s/ Kara J. Janssen

Kara J. Janssen

Attorneys for Plaintiffs